

Remarks:

Applicant appreciatively acknowledges the Examiner's confirmation of receipt of Applicant's claim for priority and certified priority document under 35 U.S.C. § 119(a)-(d).

Reconsideration of the application is respectfully requested.

Claims 12 - 27 are presently pending in the application.

Claims 1 - 11 were previously canceled. As it is believed that the claims were patentable over the cited art in their previously presented form, the claims have not been amended to overcome the references.

In item 1 of the Office Action, claims 12 - 18 and 20 - 27 were rejected under 35 U.S.C. § 103(a) as allegedly being obvious over U. S. Patent No. 6,434,139 to Liu et al ("LIU") in view of U. S. Patent No. 7,046,683 to Zhao ("ZHAO"). In item 2 of the Office Action, claim 19 was rejected under 35 U.S.C. § 103(a) as allegedly being obvious over LIU in view of ZHAO, and further in view of U. S. Patent No. 6,396,840 to Rose et al ("ROSE").

Applicant respectfully traverses the above rejections.

More particularly, claim 12 recites, among other limitations:

**processing the signaling information transferred from
the PRA ISDN connection by the packet-oriented
exchange as a BRA ISDN connection;**

. . .

adapting the signaling information transferred from
the packet-oriented exchange to the peripheral adapter
in accordance with the ISDN connection type of the PRA
ISDN connection, **wherein PRA ISDN the connections are
represented by BRA ISDN connections in the packet-
oriented exchange.** [emphasis added by Applicant]

Similarly, Applicant's claim 22 recites:

A peripheral adapter for a connection of an ISDN
private branch exchange or ISDN terminal to a packet
network, comprising a resource for **adapting signaling
information transferred from a PRA ISDN connection to
a packet-oriented exchange for the purpose of the
signaling information being processed by the packet-
based exchange as signaling information of BRA ISDN
connections.** [emphasis added by Applicant]

As such, Applicant's claims require, among other things,
processing signaling information transferred from a PRA
(Primary Rate Access) **ISDN connection as signaling information**
of a BRA (Basic Rate Access) **ISDN connection**. This feature of
Applicant's claimed invention is described in the
specification of the instant application, for example, in
paragraphs [0016] and [0026] of the published application.

However, in contrast to Applicant's particularly claimed
invention, the **LIU** and **ZHAO** references, cited against claims 1
and 22 in the Office Action, do not teach or suggest, among
other limitations of Applicant's claims, **processing signaling**

**information transferred from a PRA ISDN connection as
signaling information of a BRA ISDN connection.**

More particularly, as acknowledged in item 1.1 of the Office Action, the **LIU** reference does not teach or suggest a BRA connection between gateways. Rather, the **LIU** reference discloses a method for optimizing mobile wireless communications routed across several interconnected networks. See, for example, the title of **LIU**.

With regard to Fig.1 of **LIU**, **LIU** states that communication between a PSTN and end offices (EOs) typically utilizes trunk groups carrying PCM digital voice traffic on multiplexed channels **at a primary rate of 1.544 Mbps (T1), 2.048 Mbps (E1) or better.** See, for example, col. 4 of **LIU**, lines 9 - 12.

The PSTN of **LIU** provides the normal call communication path between the wireline subscriber units (4, 6 of Fig.1 of **LIU**), but can be bypassed using a packet data network (10 of Fig. 1 of **LIU**) having gateways (22, 24 of Fig. 1 of **LIU**) residing as hosts thereon. See, for example, col. 4 of **LIU**, lines 13 - 24.

Thus, as acknowledged on page 2 of the Office Action, **LIU** does not teach or suggest, among other limitations of Applicant's

claims, utilizing a BRA ISDN connection. Consequently, the **LIU** reference does not teach or suggest, among other limitations of Applicant's claims, any processing of signaling information transferred from a primary rate access (PRA) ISDN connection by the packet-oriented exchange as a BRA ISDN connection.

Applicant's claim 1 further requires, among other limitations:

adapting the transferred signaling information in the peripheral adapter **in accordance with the ISDN connection type of the PRA ISDN connection**; [emphasis added by Applicant]

However, the **LIU** reference does not teach or suggest, among other limitations of Applicant's claims, **adapting the transferred signaling information in the peripheral adapter in accordance with the ISDN connection type of the PRA ISDN connection**, as also required by Applicant's claim 1.

Additionally, Applicant's claim 1 requires, among other limitations

adapting the signaling information transferred from the packet-oriented exchange to the peripheral adapter **in accordance with the ISDN connection type of the PRA ISDN connection**, wherein **PRA ISDN the connections are represented by BRA ISDN connections** in the packet-oriented exchange. [emphasis added by Applicant]

However, among other limitations of Applicant's claims, **LIU** also does not teach or suggest, adapting the signaling information transferred from the packet-oriented exchange to a peripheral adapter in accordance with the ISDN connection type of the PRA ISDN connection or that the PRA ISDN connections are represented by BRA ISDN connections in the packet-oriented exchange, as further required by Applicant's claim 1.

The **ZHAO** reference, cited in the Office Action in combination with **LIU**, does not cure the above-discussed deficiencies of the **LIU** reference. More particularly, the **ZHAO** reference discloses a VOIP over access network. See, for example, the title of **ZHAO**. With regard to Fig.1 of **ZHAO**, cited to on page 2 of the Office Action, col. 2 of **ZHAO**, line 61 - col. 3, line 4 states:

Within packet-based network 20, a call agent 60 performs the call processing functions of a circuit switch, but in a different way. Call agent 60 exchanges circuit-switched signaling with the switching points controlling trunks 54, 56, using signal paths 62, 64. Call agent 60 thus performs call processing for calls on trunks 54, 56, although it does not usually physically terminate those trunks. Call agent 60 also controls gateways 50, 52, using a gateway control protocol, such as Media Gateway Control Protocol (MGCP), as described in Network Working Group RFC 2705.

Thus, **ZHAO** describes a packet-based network (20 of Fig. 1 of **ZHAO**) using a call agent (60 of Fig. 1 of **ZHAO**) to perform call processing functions of a circuit switch by exchanging

circuit-switched signaling with the switching points controlling trunks (54, 56 of Fig. 1 of **ZHAO**), via the signal paths (62, 64 of Fig. 1 of **ZHAO**). Thus, **ZHAO** discloses that the call agent 60 performs call processing for calls on trunks 54, 56, but does not usually physically terminate those trunks. In **ZHAO**, the call agent 60 controls the gateways 50, 52 using a gateway control protocol, such as MGCP. **ZHAO** further discloses that the gateways 50, 52 of Fig. 1 of **ZHAO** are deployed at the edge of the packet-based network 20 and are connected with each other to convey voice or bearer data. See, for example, col. 2 of **ZHAO**, lines 54 – 60 and col. 3 of **ZHAO**, lines 4 – 20.

However, as can be seen from columns 2 and 3 of **ZHAO**, as discussed above, **ZHAO** does not teach or suggest, among other limitations of Applicant's claims, **processing signaling information transferred from a primary rate access (PRA) ISDN connection by the packet-oriented exchange as a BRA ISDN connection.**

Further, the references do not contain any teaching, suggestion or motivation to combine them in the manner suggested in the Office Action. In particular, as neither **ZHAO**, nor **LIU**, teach or suggest **processing signaling information transferred from a primary rate access (PRA) ISDN**

connection by the packet-oriented exchange as a BRA ISDN

connection, there would not be any teaching, suggestion or motivation provided by those references to use a bearer channel (BRA) connection of **ZHAO** in combination with a primary rate access trunk of **LIU**, or to do so in the manner claimed by Applicant. There is absolutely no teaching in either **LIU** or **ZHAO** of providing any type of mapping between a PRA connection and a BRA connection. Thus, any combination of **LIU** and **ZHAO** to process a PRA connection as a BRA connection, to map between the two connections, would not be apparent to a person of ordinary skill from reading those references. The combination of **LIU** and **ZHAO** suggested in the Office Action appears to be motivated solely by the impermissible hindsight reconstruction of Applicant's claimed invention derived from reading the instant application.

Additionally, nothing in the **ZHAO** or **LIU** references teach, suggest or motivate, among other limitations of Applicant's claims, adapting the PRA connection to be handled at least partially by a packet-oriented exchange. Like **LIU**, **ZHAO** also does not teach, suggest or motivate, among other limitations of Applicant's claims, the further limitations of Applicant's claim 1 of: (a) adapting the transferred signaling information in the peripheral adapter in accordance with the ISDN connection type of the PRA ISDN connection; (b) adapting the

signaling information transferred from the packet-oriented exchange to the peripheral adapter in accordance with the ISDN connection type of the PRA ISDN connection; and (c) representing the PRA ISDN connections by BRA ISDN connections in the packet-oriented exchange.

As such, the claims of the instant application are novel and unobvious over the **LIU** and **ZHAO** references, whether taken alone or in combination.

Among other advantages, Applicant's claimed invention provides a flexible and efficient system and method for connecting ISDN private branch exchanges having peripheral adapters to a packet-switched network. Thus, in Applicant's claimed invention, the signaling information transmitted by the ISDN connection can be handled or processed in the packet-based exchange independent of the type of ISDN connection. As such, the peripheral adapter of Applicant's invention can handle all inherent functions of the physical ISDN connection.

Resultantly, with Applicant's invention, the administration of the packet-based exchange can be reduced to one standard logical ISDN port type or ISDN connection type with a fixed number of bearer channels. This correspondingly permits the cost of implementation to be reduced, as the packet-oriented

exchange of the present invention only needs to handle a single ISDN connection type.

Neither of the **LIU** or **ZHAO** references provide so much as a hint towards the solution provided by Applicant's invention of claims 1 and 22. The **ROSE** reference, cited in the Office Action in combination with **LIU** and **ZHAO** against Applicant's dependent claim 19, does not cure the above-discussed deficiencies of the **LIU** and **ZHAO** references. For the foregoing reasons, among others, Applicant's claims are believed to be patentable over the **LIU**, **ZHAO** and **ROSE** references, whether taken alone, or in combination.

It is accordingly believed that none of the references, whether taken alone or in any combination, teach or suggest the features of claims 12 and 22. Claims 12 and 22 are, therefore, believed to be patentable over the art. The dependent claims are believed to be patentable as well because they all are ultimately dependent on claims 12 or 22.

In view of the foregoing, reconsideration and allowance of claims 12 - 27 are solicited.

In the event the Examiner should still find any of the claims to be unpatentable, counsel would appreciate receiving a

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telephone call so that, if possible, patentable language can be worked out.

If an extension of time for this paper is required, petition for extension is herewith made.

Please charge any fees that might be due with respect to Sections 1.16 and 1.17 to the Deposit Account of Lerner Greenberg Stemer LLP, No. 12-1099.

Respectfully submitted,

/Kerry Pauline Sisselman/
Kerry Pauline Sisselman
Reg. No. 37,237

For Applicant

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Lerner Greenberg Stemer LLP
Post Office Box 2480
Hollywood, FL 33022-2480
Tel: (954) 925-1100
Fax: (954) 925-1101